

EXHIBIT A

From: Hansen, Milli Kanani (WAS) <Milli.Hansen@skadden.com>
Sent: Tuesday, December 3, 2024 4:04 PM
To: 'Christopher Geddis' <CGeddis@mazieslater.com>; Rose, Nina R (WAS) <Nina.Rose@skadden.com>
Cc: Adam Slater <ASlater@mazieslater.com>; Davidson, Jessica (NYC) <Jessica.Davidson@skadden.com>; Bernardo, Richard T (NYC) <Richard.Bernardo@skadden.com>
Subject: RE: [Ext] RE: Documents Needed for Jinsheng Lin's Deposition

Hi Chris –

I hope you had a good Thanksgiving.

Thanks for your patience and apologies for the delay – we were just tracking down some information and it took a little longer than expected due to client travel.

First, with respect to ZHP's retention policies, as ZHP has previously explained, there is no company-wide retention policy. Rather, it is our understanding that, to the extent documents are required to be retained for regulatory or other compliance-related reasons, those retention policies are generally embodied in a particular department's standard operating procedures or standard maintenance procedures. We have identified the following procedures that relate to retention: ZHP01793158, PRINSTON00486190, ZHP00692282, ZHP02385368, ZHP02978802, ZHP00336173, ZHP00703012, ZHP01866627, ZHP00336173, ZHP01793693, ZHP01523050, ZHP00245573, ZHP01525574, ZHP00356238, ZHP00070216, PRINSTON00486236, ZHP00702047, ZHP02672612, ZHP01793877, ZHP02667068, ZHP01525948, ZHP02379205, ZHP00702183, ZHP00494126, ZHP00859527, ZHP01793953, ZHP01794354, ZHP00275565. We are not aware of one pertaining specifically to CEMAT materials, but have asked that that be double checked since we were not involved in the original collection.

In terms of emails, our understanding is that while there has not been a ZHP policy specifically relating to email retention, ZHP's third-party email vendor had a policy of rolling off emails on its servers after two years, which we understand has been previously discussed. Individual employees may have separately maintained, at their own discretion and based on business needs, emails in their own inbox older than two years. However, such retention was subject to mailbox size and space limits.

Second, you have requested certificates of analysis and material safety data sheets for certain raw materials. Although we are willing to work with plaintiffs to facilitate Dr. Jinsheng Lin's deposition, these documents are not the types of documents Dr. Lin would ordinarily review, rely on, or use in the course of his work at CEMAT. For example, Dr. Lin has no recollection at all – which you can of course confirm during your deposition – of ever reviewing a certificate of analysis or material safety data sheet for dimethylformamide, triethylamine, or triethylamine hydrochloride in the course of his investigations into an impurity for any product. This is not surprising, as these documents are generally handled by the QC/QA departments and are not the kinds of documents he generally comes across as part of his job responsibilities. To the extent that you continue to be interested in these documents despite the foregoing explanation, we would like to meet and confer with you to discuss ways to minimize the burdens associated with plaintiffs' request for these materials.

Milli

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From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Wednesday, November 27, 2024 11:21 AM
To: Rose, Nina R (WAS) <Nina.Rose@skadden.com>
Cc: Adam Slater <ASlater@mazieslater.com>; Hansen, Milli Kanani (WAS) <Milli.Hansen@skadden.com>; Davidson, Jessica (NYC) <Jessica.Davidson@skadden.com>
Subject: [Ext] RE: Documents Needed for Jinsheng Lin's Deposition

Hi Nina,

Any update on this?

Thanks,
Chris

From: Rose, Nina R <Nina.Rose@skadden.com>
Sent: Monday, October 28, 2024 4:46 PM
To: Christopher Geddis <CGeddis@mazieslater.com>
Cc: Adam Slater <ASlater@mazieslater.com>; Hansen, Milli Kanani <Milli.Hansen@skadden.com>; Davidson, Jessica <Jessica.Davidson@skadden.com>
Subject: RE: Documents Needed for Jinsheng Lin's Deposition

Hi Chris,

We are looking into the issues raised in your letter and will get back to you soon regarding the requested discovery.

Thanks,
Nina

From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Thursday, October 24, 2024 3:49 PM
To: Davidson, Jessica (NYC) <Jessica.Davidson@skadden.com>; Rose, Nina R (WAS) <Nina.Rose@skadden.com>
Cc: Adam Slater <ASlater@mazieslater.com>
Subject: [Ext] Documents Needed for Jinsheng Lin's Deposition

Hi Jessica and Nina,

Please see attached for Plaintiffs' letter regarding the documents needed for Jinsheng Lin's deposition.

Best,
Chris

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